

Jeffrey Chubak
Amini LLC
131 West 35th Street
12th Floor
New York, NY 10001
(212) 497-4100
jchubak@aminillc.com

Attorneys for Petitioner Magnus Löfving as
Administrator of Debtor Go North Group
AB

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Case No. 24-11598 (MEW)

GO NORTH GROUP AB,

Chapter 15

Debtor in a Foreign Proceeding.

**EX PARTE MOTION FOR ORDER SPECIFYING FORM AND MANNER OF
SERVICE OF NOTICE AND SCHEDULING RECOGNITION HEARING**

Petitioner Magnus Löfving, the duly appointed administrator (“Petitioner”) of the above-named debtor Go North Group AB (“Debtor”), which commenced a restructuring proceeding in and was brought under supervision of the District Court of Gothenburg, Sweden (“Swedish Proceeding”), submits this motion for an order (1) scheduling a hearing on the petition for recognition (“Recognition Hearing”) of the Swedish proceeding as a foreign main proceeding and fixing an objection deadline at seven days before the hearing; (2) approving form of notice of the Recognition Hearing and objection deadline in the form attached hereto (“Notice”); and (3) approving service of the Notice by email or alternatively first class mail on the parties listed on the Chapter 15 List filed pursuant to FRBP 1007(a)(4).

1. FRBP 2002(q)(1) requires that parties be given at least twenty-one days’ notice of the Recognition Hearing. Out of an abundance of caution, Petitioner requests that said hearing be

scheduled around thirty days after entry of the order hereon to permit additional time for service by first class mail.

2. FRBP 2002(m) authorizes the Court to enter an order “designating … the form and manner in which notice shall be given.” Consistent with FRBP 2002(q)(1) the proposed form of Notice notifies parties of the commencement of this case, the date of the Recognition Hearing and the objection deadline. Petitioner respectfully submits no further notice is warranted under the circumstances.

3. In accordance with LBR 2002-4, the Notice includes a statement that, at the Recognition Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of this case.

4. While the Notice does not contain the information set forth in 11 U.S.C. § 1514(c), said section does not apply because this is an ancillary case, and not a plenary case under 11 U.S.C. § 1511(a)(2), and creditors will not be filing proofs of claim herein. See Collier on Bankruptcy ¶1514.01 (16th ed.) (§ 1514 is the “last in a series of sections dealing with the international aspects of cases under chapters other than chapter 15 that began with section 1511”).

5. FRBP 2002(q)(1) requires that at least twenty-one days’ notice of the Recognition Hearing be given to all persons on the Chapter 15 List. Petitioner proposes to serve the Notice, together with the Chapter 15 petition, memorandum of law in support, declarations in support and proposed form of recognition order by e-mail or alternatively by first class mail on the Chapter 15 List, which includes all known United States creditors of the Debtor. (Looysen Decl. ¶11.)

6. No prior request for the relief requested herein has previously been made to this Court or to any other court.

Dated: New York, NY
September 16, 2024

Amini LLC

/s/ Jeffrey Chubak

Jeffrey Chubak
131 West 35th Street
12th Floor
New York, NY 10001
(212) 497-4100
jchubak@aminillc.com

Attorneys for Petitioner Magnus Löfving as
Administrator of Debtor Go North Group
AB